

**CITY OF INDIANAPOLIS****STEPHEN GOLDSMITH  
MAYOR**

December 20, 1999

VIA CERTIFIED MAIL Z 250 237 842

Mr. Ronnie Winkler  
Ideal Graphics, Inc.  
1445 Brookside Way Suite A  
Indianapolis, Indiana 46239

Re: Exempt Operation Status,  
**E097-11477-00363**

Dear Mr. Winkler:

The application from Ideal Graphics, Inc., received on August 26, 1999, has been reviewed. Based on the data submitted and the new provisions in Sections 1 and 2 of state regulation 326 IAC 2-1, it has been determined that the following operations, located at 1445 Brookside Way Suite A, Indianapolis, Indiana, are classified as exempt from air pollution permit requirements:

- a) One (1) Heidelberg printing press (Model number SORM2), identified as emission unit 1;
- b) One (1) Hamada printing press (Model number C-2485), identified as emission unit 2.

The following conditions shall be applicable:

1. Pursuant to 326 IAC 5-1-2 (Visible Emission Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), the visible emissions shall meet the following:
  - (a) visible emissions shall not exceed an average of 30% opacity in 24 consecutive readings.
  - (b) visible emissions shall not exceed 60% opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.
2. There are no New Source Performance Standards (326 IAC 12) or National Emission Standards for Hazardous Air Pollutants for Source Categories (40CFR Part 63) applicable to this facility.





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Any change or modification which may increase the potential emissions above the thresholds listed in 326 IAC 2-1 must be approved by the Environmental Resources Management Division (ERMD) before such change may occur. If you have any questions, please contact Elisa Bingham at 327-2264.

This exemption supersedes all other permits issued by the ERMD.

Sincerely,

Robert F. Holm, Ph.D  
Administrator

EJB

cc: Mark Caraher, Permits Program Manager  
Matt Mosier, Compliance Program Manager  
Cheryl Carlson, Enforcement Program Manager  
Mindy Hahn, IDEM



**Environmental Resources Management Division  
Air Quality Management Section**

**Technical Support Document (TSD) for Exempted Units**

**Source Background and Description**

|                   |   |
|-------------------|---|
| Source Name:      | Ideal Graphics                                    |
| Source Location:  | 1445 Brookside Way Suite A Indianapolis, IN 46239 |
| County:           | Marion  |
| Exemption number: | E097-11477-00363                                  |
| Permit Reviewer:  | Elisa Bingham                                     |

The Environmental Resources Management Division (ERMD) has reviewed an application from Ideal Graphics relating to the operation of printing equipment.

**Exempted Units**

- (a) One (1) Heidelberg SORM2 Printing press, identified as emission unit 1;
- (b) One (1) Hamada C-2485 Printing press, identified as emission unit 2.

**Enforcement Issue**

No enforcement action is pending.

**Recommendation**

The staff recommends to the Administrator that an exemption from air pollution permit requirements be approved for the operation. This recommendation is based on the following facts and conditions:

Information, unless otherwise stated, used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on August 26, 1999, with additional information obtained on December 13, 1999.

**Emissions Calculations**

See TSD Appendix A for detailed calculations.

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### Total Allowable Emissions

Indiana Permit Allowable Emissions Definition (after compliance with applicable rules, based on 8,760 hours of operation per year at rated capacity):

| Pollutant                            | Potential Emissions<br>(tons/year) |
|--------------------------------------|------------------------------------|
| Particulate Matter (PM)              | 0.0                                |
| Particulate Matter (PM10)            | 0.0                                |
| Sulfur Dioxide (SO <sub>2</sub> )    | 0.0                                |
| Volatile Organic Compounds (VOC)     | 0.35                               |
| Carbon Monoxide (CO)                 | 0.0                                |
| Nitrogen Oxides (NO <sub>x</sub> )   | 0.0                                |
| Single Hazardous Air Pollutant (HAP) | 0                                  |
| Combination of HAPs                  | .0722                              |

Potential emissions (as defined in the Indiana Rule) of any regulated pollutants are less than any criteria pollutant threshold, in tons per year, as stated in 326 IAC 2-1.1-3(d)(1) (Exemptions).

Therefore, pursuant to the provisions in Indianapolis Air Pollution Control Board Regulation 2 (Permits) and 326 IAC 2-1, this source is classified as exempt from air pollution permit requirements.

### County Attainment Status

The source is located in Marion County.

| Pollutant       | Status     |
|-----------------|------------|
| PM-10           | attainment |
| SO <sub>2</sub> | attainment |
| NO <sub>2</sub> | attainment |
| Ozone           | attainment |
| CO              | attainment |
| Lead            | attainment |

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Marion County has been classified as attainment or unclassifiable for PM-10, SO<sub>2</sub>, NO<sub>2</sub>, Ozone, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions  
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, or 326 IAC 2-3 and since there are no applicable New Source

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Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

### **Part 70 Permit Determination**

#### **326 IAC 2-7 (Part 70 Permit Program)**

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This is the first air approval issued to this source.

### **Federal Rule Applicability**

There are no New Source Performance Standards (326 IAC 12) or National Emission Standards for Hazardous Air Pollutants for Source Categories (40 CFR Part 63) applicable to this facility.

### **State Rule Applicability- Entire Source**

#### **326 IAC 2-1 (Permit Review Rules)**

This source applied for a permit on August 26, 1999 for a printing operation. Pursuant to 326 IAC 2-1.1, the printing operation qualifies at exempt status.

#### **326 IAC 5 (Opacity Regulations)**

Pursuant to 326 IAC 5-1-2 (Visible Emission Limitations) except provided in 326 IAC 5-1-3 (Temporary Exemptions), the visible emissions shall meet the following:

- a) Visible emissions shall not exceed an average of 30% opacity in 24 consecutive readings.
- b) Visible emissions shall not exceed 60% opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.

### **State Rule Applicability - Individual Facilities**

1. IAPCB Regulation 2 (Permits) and 326 IAC 8-1-6 (General provisions relating to VOC rules: general reduction requirements for new facilities)
  - (a) This rule does not apply due to the potential VOC emissions being below twenty-five (25) tons per year.
2. IAPCB Regulations 2 (Permits) and 326 IAC 8-5-5 (Miscellaneous operations: graphic arts operations)
  - (a) This rule does not apply due to the potential VOC emissions being below twenty-five (25) tons per year.

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### **Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 189 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the ERMD Construction Permit Application Form Y.

The New Toxics Control Rule 326 IAC 2-1-3.4 will not apply to this modification because a single HAP will not be emitted at a rate of 10 tons per year or more or a combination of HAPs will not be emitted at a rate of 25 tons per year or more.

### **Conclusion**

The operation of Ideal Graphics, Inc. shall be subject to the conditions of the attached exemption E097-11477-00363.

## APPENDIX A

### VOC Calculations

1. Rycoline blanket & roller wash 20 gal/yr.
2. Rycoline 20 gal/yr.
3. Ryco KO1 20 gal/yr.
4. Ryco KO2 20 gal/yr.
5. Rycoline blk. Cleaner 401 55 gal/yr.

#### 1. Rycoline blanket & rollerwash

$$(20 \text{ gal/yr.}) (100\% \text{ volatile}) (4.3 \text{ lbs./gal density}) (1/20001) = 0.04 \text{ tons/yr.}$$

#### 2. Rycoline

$$(20 \text{ gal/yr.}) (100\% \text{ volatile}) (4.3 \text{ lbs./gal density}) (1/20001) = 0.04 \text{ tons/yr.}$$

#### 3. Ryco KO1

$$(20 \text{ gal/yr.}) (90.5\% \text{ volatile}) (6.98 \text{ lbs./gal density}) (1/2000) = 0.06 \text{ tons/yr.}$$

#### 4. Ryco KO2

$$(20 \text{ gal/yr.}) (100\% \text{ volatile}) (4.91 \text{ lbs./gal}) (1/2000) = 0.05 \text{ tons/yr.}$$

#### 5. Blanket Cleaner 401

$$(55 \text{ gal/yr.}) (100\% \text{ volatile}) (3.63 \text{ lbs./gal}) (1/2000) = 0.10 \text{ tons/yr.}$$

**Total VOCs : 0.29 tons/yr.**

### HAPs Calculations

#### 1. Ryco KO2

|             |      |   |
|-------------|------|---|
| Naphthalene | 10%  | $(10\%) (.05 \text{ tons/yr.}) = .005 \text{ tons/yr.}$     |
| Toluene     | .01% | $(.01\%) (.05 \text{ tons/yr.}) = .000005 \text{ tons/yr.}$ |

#### 2. Blanket Cleaner 401

|                    |     |  |
|--------------------|-----|--|
| Methylene Chloride | 30% | $(30\%) (0.1 \text{ tons/yr.}) = .03 \text{ tons/yr.}$ |
| Xylene             | 30% | $(30\%) (0.1 \text{ tons/yr.}) = .03 \text{ tons/yr.}$ |
| Ethyl Benzene      | 1%  | $(1\%) (0.1 \text{ tons/yr.}) = .001 \text{ tons/yr.}$ |

#### 3. Rycoline Blanket & Rollerwash

|        |    |  |
|--------|----|--|
| Xylene | 5% | $(5\%) (0.04 \text{ tons/yr.}) = .004 \text{ tons/yr.}$  |
| Cumene | 4% | $(4\%) (0.04 \text{ tons/yr.}) = .0032 \text{ tons/yr.}$ |

**Total HAPs 0.0732 tons/year**